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December 26, 2024

VIA ECF

Honorable Michael E. Farbiarz, U.S.D.J.
Frank R. Lautenberg U.S. Post Office & Courthouse
2 Federal Square
Newark, New Jersey 07012

Re: *In re Celgene Corp. Sec. Litig.*, Case No. 2:18-cv-04772-MEF-JBC

Dear Judge Farbiarz:

We write on behalf of Defendants Celgene Corporation, Terrie Curran, and Philippe Martin (“Defendants”) to request a two-week extension, from December 26, 2024 to January 9, 2025, to file Defendants’ motion to seal materials filed with their reply brief in support of their Motion to Bifurcate Trial, Dkt. 358. The extension will allow Defendants to continue to confer in good faith with Plaintiff and other interested parties with the goal of either reducing or eliminating the amount of information Defendants seek to file under seal. Defendants have not previously sought an extension of this deadline. Plaintiff does not oppose the request. We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Kevin M. McDonough
Kevin M. McDonough
of LATHAM & WATKINS LLP

cc: All Counsel of Record (via ECF)

SO ORDERED

s/James B. Clark, III
James B. Clark, III, USMJ

dated: 12/30/2024